
United States District Court

WESTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

v.

Case No. 05-0219-JTM-01/02

(1) KENNETH AGUGUA
DOB: xx/xx/1959
(2) FAITH CHIKA AGUGUA
DOB: xx/xx/1972

Health Care Fraud - 18 U.S.C. § 1347
NMT 10 Years Imprisonment
NMT \$ 250,000 Fine
NMT 3 Years Supervised Release
\$100 Special Assessment
Class C Felony

I, the undersigned complainant being first duly sworn, state that the following is true and correct to the best of my knowledge and belief:

Between on or about May 7, 2004, and September 29, 2005, in Kansas City, Jackson County, within the Western District of Missouri and elsewhere, and in connection with the delivery of and payment for health care benefit services and in a manner that affected interstate commerce, the defendants, Kenneth Agugua and Faith Chika Agugua, did unlawfully, willfully and knowingly execute and attempt to execute a scheme and artifice to (i) defraud a health care benefit program, namely, the Medicare program, and (ii) obtain, by means of false and fraudulent pretenses, representations and promises, money and property owned by, and under the custody and control of a health care benefit program, namely, the Medicare program, all in violation of Title 18, United States Code, Section 1347.

I further state that I am a Special Agent with the Department of Health and Human Services, Office of Inspector General, Office of Investigations (HHS-OIG-OI), and that this complaint is based on the facts set forth in the attached affidavit.

Continued on the attached sheets and made a part hereof: ☒ Yes ☐ No.

Brian Hill, Special Agent
HHS-OIG-OI

Sworn to before me and subscribed in my presence,

December _____, 2005
Date

at

Kansas City, Missouri
City and State

John T. Maughmer
Chief United States Magistrate Judge

Name and Title of Judicial Officer

Signature of Judicial Officer